

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

ILYA BRAUDE \*

Plaintiff \*

v. \*

Case No.: 1:17-cv-00364

ALLA VILNYANSKAYA \*

Defendant. \*

\* \* \* \* \*

AFFIDAVIT OF ALLA VILNYANSKAYA

I, Alla Vilnyanskaya, hereby depose and say as follows:

1. I am the Defendant in the above noted case. I am over the age of 18, I am competent to be a witness, and I have personal knowledge of the facts and matters stated in this Affidavit.

2. I confirm that the Plaintiff in this case has never hit me, beaten me, or physically forced me into sexual intercourse with him or attacked me.

3. I confirm that I have taken down my Kaleidoscope blog in its entirety referenced in the Plaintiff's Complaint filed in this case.

4. I confirm that I have not and will not re-post on my Kaleidoscope blog any of the blog posts from my Kaleidoscope blog referenced in the Plaintiff's Complaint filed in this case.

5. I confirm that I have not and will not publish in any other print, electronic, or any other media, any of the blog posts from my Kaleidoscope blog referenced in the Plaintiff's Complaint filed in this case.

6. I confirm that to the best of my knowledge, information, and belief, the October 2016 posts in the comments section of the Technical.ly Philly story referenced in the Plaintiff's Complaint filed in this case have been removed from the comments section.

7. I confirm that I have not and will not publish in any other print, electronic, or any other media, the October 2016 posts in the comments section of the Technical.ly Philly story referenced in the Plaintiff's Complaint filed in this case.

8. I confirm that I have not and will not publish in any other print, electronic, or any other media, the e-mails referenced in Paragraphs 37-53 of the Plaintiff's Complaint filed in this case.

9. I confirm that I do not know whether the Plaintiff has ever vandalized my car or instructed any third parties to vandalize my car or ever hacked into my e-mail, Google account, or other electronic accounts.

10. I confirm that I will not publish any statements naming or relating in any way to the Plaintiff or his family members in any print, electronic, or any other media.

11. I confirm that I will take all reasonable steps to have any existing protective orders against the Plaintiff rescinded and shielded. Other than the protective orders, there is no other litigation.

IN ACCORDANCE WITH 28 U.S.C. § 1746, I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Date: Sept 20, 2014



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Alla Vilnyanskaya